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October 13, 2020

The Honorable Jocelyn G. Boyd Chief Clerk and Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

Re: Adjudication of Class E – Household Goods Movers Cases.

Dear Ms. Boyd:

I write to suggest a new procedure to assist the Commission with its adjudication of household goods movers' applications.

My suggestion regards the interlude between the Commission's vote on an application and the issuance of its order. A household goods mover must wait until the Commission issues an order approving their application before the ORS issues it a certificate of public convenience and necessity ("CPC&N") upon presenting the required insurance certificates. Several weeks may pass between directive and order, depending on the Commission's workload, and the household goods mover, whom the Commission has voted to approve, cannot work during this period. This period can be very stressful for the mover, who is often a small business with limited resources.

The Commission could alleviate the burden on approved household goods movers with a change in procedure. It could allow ORS to issue a CPC&N after the directive approving the application has been served, and the carrier provides proof of the requisite insurance. The new procedure would allow a household goods mover to provide service while the Commission drafts the final order. The Commission would have the discretion to vary from this procedure if warranted by circumstances. If adopted, the suggested procedure would relieve financial pressure experienced by qualified applicants without disrupting the Commission's process for issuing orders.

Thank you for your consideration of this suggestion, which I hope the Commission will accept in the spirit in which it is intended. I intend no criticism of the Commission. I appreciate the Commission's busy schedule and the time required to issue well drafted orders.

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With best wishes, I am,

Sincerely yours,

Charles L.A. Terreni

c: Jeffrey M. Nelson, Esq. Roger Hall, Esq.